UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

MAR 0 9 2018

REPLY TO THE ATTENTION OF

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Bill Sears, Plant Manager
AOC, LLC
2552 Industrial Drive
Valparaiso, Indiana 45383

Re: Notice and Finding of Violation
AOC, LLC
Valparaiso, Indiana

Dear Mr. Sears:

The U.S. Environmental Protection Agency is issuing the enclosed Notice and Finding of Violation (NOV/FOV) to AOC, LLC (you) under Sections 113(a)(1) and (a)(3) of the Clean Air Act, 42 U.S.C. § 7413(a)(1) and (a)(3). We find that you are violating the Indiana State Implementation Plan, the National Emission Standards for Hazardous Air Pollutants for Miscellaneous Organic Chemical Manufacturing, your Federally Enforceable State Operating Permit, and Title V of the Clean Air Act at your Valparaiso, Indiana facility.

Section 113 of the Clean Air Act gives us several enforcement options. These options include issuing an administrative compliance order, issuing an administrative penalty order and bringing a judicial civil or criminal action.

We are offering you an opportunity to confer with us about the violations alleged in the NOV/FOV. The conference will give you an opportunity to present information on the specific findings of violation, any efforts you have taken to comply and the steps you will take to prevent future violations. In addition, in order to make the conference more productive, we encourage you to submit to us information responsive to the NOV/FOV prior to the conference date.

Please plan for your facility's technical and management personnel to attend the conference to discuss compliance measures and commitments. You may have an attorney represent you at this conference. Enclosed is an EPA information sheet entitled *U.S. EPA Small Business Resources*, which may be helpful if you are a qualified small business.

The EPA contacts in this matter are Linda H. Rosen and Jason Schenandoah. You may call Ms. Rosen or Mr. Schenandoah at (312) 886-6810, or (312) 886-9506, respectively, to request a conference. You should make the request within 10 calendar days following receipt of this letter. We should hold any conference within 30 calendar days following receipt of this letter.

Sincerely,

Edward Nam
Director
Air and Radiation Division

Enclosures

cc: Phil Perry, Chief
Air Compliance Branch
Indiana Department of Environmental Management

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5

IN THE MATTER OF:	)	
	)	
	)	
AOC, LLC	)	**NOTICE AND FINDING**
Valparaiso, Indiana	)	**OF VIOLATION**
	)	
Proceedings Pursuant to	)	**EPA-5-18-IN-01**
Sections 113(a)(1) and (a)(3)	)	
of the Clean Air Act, 42 U.S.C.	)	
§ 7413(a)(1) and (a)(3)	)	

NOTICE OF VIOLATION

The U.S. Environmental Protection Agency (EPA) is issuing this Notice and Finding of Violation under Sections 113(a)(1) and (a)(3) of the Clean Air Act (CAA), 42 U.S.C. § 7413(a)(1) and (a)(3). EPA finds that AOC, LLC (AOC) is violating its Federally Enforceable State Operating Permit (FESOP), the Indiana State Implementation Plan (SIP), the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Miscellaneous Organic Chemical Manufacturing, at 40 C.F.R. Part 63, Subpart FFFF, and Title V of the CAA, as follows:

Statutory and Regulatory Background

Federally Enforceable State Operating Permit Program

1. On August 18, 1995, EPA approved the State of Indiana's FESOP program as part of the federally enforceable SIP for Indiana. 60 Fed. Reg. 43,008. Indiana's FESOP program became effective on October 17, 1995.

FESOP Requirements

2. On February 12, 2009, the Indiana Department of Environmental Management (IDEM) issued FESOP Renewal No. F127-25003-00003 to AOC (the 2009 FESOP). On October 27, 2011, IDEM issued Administrative Amendment No. F127-30894-00003 to update the 2009 FESOP (the 2011 FESOP). On February 12, 2016, IDEM issued Administrative Amendment No. F127-36700-00003 to update the 2009 FESOP (the 2016 FESOP).

3. Condition C.2 of the 2011 FESOP and Condition C.2 of the 2016 FESOP state that the purpose of the FESOP is to limit the source's potential to emit to less than major source levels for the purpose of Section 502(a) of the CAA, 42 U.S.C. § 7661a(a). Both FESOPs require that the potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than 10 tons per 12 consecutive month period.

4. Condition D.2.1 of the 2011 FESOP and Condition D.2.1 of the 2016 FESOP require, among other things, that the facility maintain an overall efficiency of 99.75 percent (%) for the thermal oxidizer.

5. Condition D.2.3 of the 2011 FESOP and Condition D.2.3 of the 2016 FESOP require that AOC operate the thermal oxidizer at all times that the reactors are in operation.

6. Condition D.2.5(a) of the 2011 FESOP and Condition D.2.5(a) of the 2016 FESOP require that AOC continuously monitor, no less often than once per minute, the operating temperature of the thermal oxidizer and record the output as a 3-hour average.

7. Condition D.2.5(d) of the 2011 FESOP and Condition D.2.5(d) of the 2016 FESOP require that AOC operate the thermal oxidizer at or above the minimum 3-hour average temperature determined from the most recent compliant stack test.

8. Condition D.2.6 of the 2011 FESOP and Condition D.2.6 of the 2016 FESOP require that AOC maintain the duct pressure or fan amperage within the normal range as established in the most recent compliant stack test. If the duct pressure or fan amperage is outside the respective established range, AOC shall take response steps in accordance with Section C of the either the 2011 or 2016 FESOP - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C of the 2011 or 2016 FESOP shall be considered a deviation from the applicable FESOP.

9. Condition C.15 of the 2011 FESOP and Condition C.15 of the 2016 FESOP require that upon detecting an excursion where a response step is required or an exceedance of a limitation set forth in the FESOP, AOC must take reasonable response steps to restore operation of the emissions unit (including any control device and capture system) to its normal or usual manner of operation as expeditiously as practical in accordance with good air pollution control practices for minimizing excess emissions. The response shall include minimizing any period of startup, shutdown or malfunction. The response may include, among other things, an initial inspection and evaluation; recording that operations returned to normal without AOC action; and any necessary follow-up actions to return the operation to normal or usual manner of operation.

10. Conditions D.3.4, D.4.4, and D.5.6 of the 2011 FESOP and Conditions D.3.4, D.4.4, and D.5.6 of the 2016 FESOP require that AOC measure the emission concentrations from each activated carbon unit weekly. When the styrene concentrations are in excess of 50 parts per million (ppm), AOC must place into service a stand-by set of carbon canisters and remove, regenerate and place into stand-by service the spent carbon canisters.

NESHAP Requirements

11. The NESHAP for Miscellaneous Organic Chemical Manufacturing (the MON) applies to miscellaneous organic chemical manufacturing process units (MCPU) that are located at, or are part of, a major source of HAP emissions.

12. The MON at 40 C.F.R. § 63.2550 defines "miscellaneous organic chemical manufacturing process" as all equipment which collectively function to produce a product or isolated intermediate that are materials described in 40 C.F.R. § 63.2435(b).

13. The MON at 40 C.F.R. § 63.2435(b) states that an MCPU includes equipment necessary to operate a miscellaneous chemical manufacturing process and must satisfy all of the conditions of 40 C.F.R. § 63.2435(b)(1) through (3).

14. The MON at 40 C.F.R. § 63.2435(b) states that an MCPU also includes any assigned storage tanks and transfer racks; equipment in open systems that is used to convey or store water having the same concentration and flow characteristics as wastewater, and components such as pumps, compressors, agitators, pressure relief devices, sampling connection systems, open-ended valves or lines, valves, connectors, and instrumentation systems that are used to manufacture any material or family of materials described in 40 C.F.R. § 63.2435(b)(1)(i) through (v).

15. The MON at 40 C.F.R. § 63.2435(b)(1) requires that the MCPU produce materials or a family of materials such as organic chemicals classified using the 1987 version of the Standard Industrial Classification (SIC) code 282, among others (40 C.F.R. § 63.2435(b)(1)(i)), or organic chemicals classified using the 1997 version of North American Industry Classification System (NAICS) code 325 not including 325131, 325181, 325188 (except the requirements do apply to hydrazine), 325314, 325991 (except the requirements do apply to reformulating plastics resins from recycled plastics products), and 325992 (except the requirements do apply to photographic chemicals) (40 C.F.R. § 63.2435(b)(1)(ii)).

16. The MON at 40 C.F.R. § 63.2435(b)(2) requires that the MCPU process, use or generate any of the organic HAP listed in Section 112(b) of the CAA, 42 U.S.C. § 7412(b), or hydrogen halide and halogen HAP as defined in 40 C.F.R. § 63.2550.

17. The MON at 40 C.F.R. § 63.2435(b)(3) requires that the MCPU not be an affected source under another Subpart of Part 63, except for process vents from batch operations within a chemical manufacturing process, in which case the batch process vents are subject to the MON.

18. The MON at 40 C.F.R. § 63.2435(c) exempts the following operations from meeting the requirements of the MON: research and development facilities; the manufacture of aluminum sulfate as a by-product; affiliated operations located at affected sources under certain other NESHAPs; certain fabricating operations; and production facilities with certain NAICS codes; tall oil recovery systems; and carbon monoxide production.

19. The MON at 40 C.F.R. § 63.2 defines "major source" as any stationary source or group of stationary sources located within a contiguous area and under common control that emits or has the potential to emit considering controls, in the aggregate, 10 tons per year or more of any HAP or 25 tons per year or more of any combination of HAPs.

20. The MON at 40 C.F.R. § 63.2515(b) requires the owner or operator of an MCPU to submit an initial notification no later than 120 days after becoming subject to the MON.

Title V Requirements

21. State operation permit program conditions, at 40 C.F.R. § 70.3(a), require, in relevant part, that the state program provide permitting of major sources.

22. State operating permit program conditions, at 40 C.F.R. § 70.5(a)(1), require that an application for a source applying for a part 70 permit for the first time be submitted within 12 months after the source becomes subject to the permit program or on or before such earlier date as the permitting authority may establish.

AOC's Facility and Relevant Factual Information

23. AOC owns and operates a manufacturing facility, located at 2552 Industrial Drive, Valparaiso, Indiana that makes polyester resin solutions in styrene (the Facility).

24. On March 9, 2017, EPA inspected the Facility. On March 13, 2017, EPA sent an electronic mail message to Bill Sears, Plant Manager, requesting specific information. On March 16, 2017, AOC submitted the following information, among other things: (1) records of the Facility's thermal oxidizer temperature readings for the last three years; (2) a description of the Facility's temperature data compression methods; (3) copies of the Facility's Toxic Release Inventory (TRI) reports for Reporting Year (RY) 2013, 2014, and 2015; and (4) an explanation of the method of emission calculation for the TRI reports.

25. On July 21, 2017, EPA issued AOC a Request for Information (RFI) pursuant to Section 114(a) of the CAA, 42 U.S.C. § 7414(a), which was received by AOC on July 26, 2017. On August 21, 2017, AOC submitted its response to the RFI.

26. The RFI requested, among other things, that AOC provide (1) copies of the 3-hour average temperatures for the thermal oxidizer for the period January 1, 2013 to July 26, 2017, and the underlying temperature data for the period January 1, 2013 to March 12, 2014, and from March 13, 2014 to July 26, 2017; (2) copies of records kept of the daily duct pressure or fan amperage for the period January 1, 2013 to July 26, 2017; (3) copies of records of the styrene concentration at all carbon canister outlets and the log of the dates of carbon canister replacement and regeneration for the period January 1, 2013 to July 26, 2017; (4) dates and times when the thermal oxidizer and/or one or both reactors was not operating for the period January 1, 2013 to July 26, 2017; (5) dates and times of all malfunctions of process or control equipment for the period January 1, 2013 to July 26, 2017, and the corrective actions taken; and (6) copies of stack tests on the thermal oxidizer since January 1, 2007.

27. The RFI also requested that AOC provide: (1) the SIC code (1987 version) and the NAICS code (1997 version) that apply to its production processes; (2) the TRI Report for 2016; and (3) copies of any initial notifications or notifications of compliance submitted by AOC to IDEM or EPA pursuant to 40 C.F.R. Part 63.

28. In its response to the RFI, AOC stated it does not actively store 3-hour thermal oxidizer temperature data at the Facility and that roughly one temperature data point every 2.5

minutes is stored. For purposes of responding to the RFI, AOC calculated temperature averages from a sample size of approximately 72 data points, or approximately 180 minutes.

29. In its response to the RFI, AOC submitted records of the thermal oxidizer combustion fan duct pressure for the period January 1, 2015 to July 26, 2017.

30. In its response to the RFI, AOC provided a report of stack testing conducted on the thermal oxidizer on September 10-11, 2009. The test indicated that the destruction efficiency of the thermal oxidizer was above 99.76 percent (%) with an average temperature of 1458°F.

31. In its response to the RFI, AOC provided a report of stack testing conducted on the thermal oxidizer on September 4, 2014. This is the most recent compliant stack test performed at the Facility. The test indicated that the destruction efficiency of the thermal oxidizer was above 99.76 % with an average temperature of 1482°F. During the test, the fan duct pressure was measured every 15 minutes and the average fan duct pressure was 25.33 ounces per square inch (oz/in^2).

32. In its response to the RFI, AOC submitted records of malfunctions and corrective actions at the Facility for the period January 1, 2013 to July 26, 2017.

33. In its response to the RFI, AOC provided downtimes of the thermal oxidizer and each reactor for the period January 1, 2013 to July 26, 2017.

34. AOC calculated and reported actual emissions of styrene emitted to the air from the Facility as 10.14 and 10.75 tons per year in, 2015 and 2016, respectively.

35. Styrene is an organic HAP listed in Section 112(b)(1) of the CAA, 42 U.S.C. § 7412(b)(1). AOC emits more than 10 tons per year of an HAP and is a major source of HAP.

36. In its response to the RFI, AOC stated that the SIC code 2821 "Plastics Materials, Synthetic and Resins, and Nonvulcanizable Elastomers" and NAICS code 325211 "Plastics Material and Resin Manufacturing Company" are applicable to its production processes, and, therefore, AOC's styrene operation meets the requirement of 40 C.F.R. § 63.2435(b)(1).

37. AOC's collection of equipment at the Facility produces materials described in 40 C.F.R. § 63.2435(b)(1) and is therefore a "miscellaneous organic chemical manufacturing process" as defined in 40 C.F.R. § 63.2435(b).

38. AOC uses styrene at the Facility, which is one of the organic HAPs listed in Section 112(b)(1) of the CAA, 42 U.S.C. 7412(b)(1), and, therefore, AOC's styrene operation meets the requirement of 40 C.F.R. § 63.2435(b)(2).

39. AOC's styrene operation is not an affected source under another Subpart of Part 63 and, therefore, meets the requirement of 40 C.F.R. § 63.2435(b)(3).

40. AOC's styrene operation is not one of the exempt operations listed in 40 C.F.R. § 63.2435(c).

41. From at least January 1, 2016 to the present, AOC has been a major source of HAP that operates an MPCU within the meaning of 40 C.F.R. §§ 63.2435 and 63.2440 and is, therefore, subject to the MON at 40 C.F.R. Part 63, Subpart FFFF.

42. From at least January 1, 2016 to the present, AOC has been a major source of HAP and its FESOP does not exempt the Facility from meeting Title V requirements. AOC has therefore been subject to the Indiana Title V program from at least January 1, 2016.

Violations

43. AOC has failed to continuously monitor the operating temperature of the thermal oxidizer, at least once per minute, and record the output as a 3-hour average, in violation of Condition D.2.5 of both the 2011 FESOP and the 2016 FESOP.

44. For the following 3-hour periods, AOC failed to operate the thermal oxidizer at or above the minimum 3-hour average temperature of 1458°F or 1482°F determined from the September 10-11, 2009 and September 4, 2014 stack tests, respectively, in violation of Condition D.2.5 of both the 2011 FESOP and the 2016 FESOP:

Date of Exceedance	3-hour Period	3-hour Average Temperature
03/09/2013	12:00AM - 3:00AM	1388.85°F
05/04/2013	12:00PM - 3:00PM	1380.95°F
01/12/2014	12:00PM - 3:00PM	1446.25°F
08/23/2014	9:00AM -12:00PM	1419.5°F
09/20/2014	3:00PM - 6:00PM	1462.3°F
11/17/2014	6:00PM - 9:00PM	1263.4°F
11/17/2014	9:00PM -12:00AM	1234.6°F
01/09/2015	9:00PM -12:00AM	1358.6°F
02/15/2015	3:00PM - 6:00PM	1051.68°F
05/13/2015	12:00PM - 3:00PM	1209.33°F
05/13/2015	3:00PM - 6:00PM	1244.48°F

05/21/2015	9:00PM -12:00AM	1265.78°F
05/22/2015	12:00AM - 3:00AM	1275.53°F
07/02/2015	3:00PM - 6:00PM	1477.15°F
07/22/2015	12:00PM - 3:00PM	1460.83°F
01/01/2016	12:00PM - 3:00PM	1463.6°F
02/19/2016	12:00AM - 3:00AM	1427.35°F
02/19/2016	3:00AM - 6:00AM	1442.61°F
06/23/2016	6:00AM - 9:00AM	1420.62°F
06/24/2016	6:00AM - 9:00AM	1316.38°F
12/02/2016	9:00AM - 12:00PM	1198.31°F
05/10/2017	9:00PM -12:00AM	1396.91°F
05/11/2017	12:00AM - 3:00AM	1037.77°F
05/17/2017	6:00AM - 9:00AM	1481.46°F
07/12/2017	6:00PM - 9:00PM	1459.59°F

45. On the following days, AOC measured styrene concentrations from activated carbon units in excess of 50 ppm, but did not timely place into service a stand-by set of carbon canisters, in violation Conditions D.3.4, D.4.4, and D.5.6 of the 2011 FESOP and the 2016 FESOP:

Date of Measurement	Carbon System	Reading (ppm)	Date of Replacement
05/24/2015	ST 12-21	58.1	05/29/15
05/22/2016	ST 12-21	53.2	05/26/16
08/28/2016	ST 12-21	167.0	08/29/16
08/28/2016	ST 2-9	54.6	08/29/16

05/07/2017	ST 2-9	61.5	05/11/17
07/23/2017	ST 2-9	72.0	07/27/17

46. As detailed in Enclosure 1 to this NOV and FOV, on numerous days from January 1, 2015 to July 4, 2017, the thermal oxidizer combustion fan duct pressure was less than the 25.33 oz/in^2 minimum value established during the September 4, 2014 stack test and AOC did not take any response steps, in violation of Conditions D.2.6 and C.15 of the 2011 FESOP and the 2016 FESOP.

47. On the following dates and times, AOC failed to operate the thermal oxidizer when one or more of its reactors was operating, in violation of Condition D.2.3 of the 2011 FESOP and the 2016 FESOP:

Thermal Oxidizer Not Operating - Dates and Times	Reactors Operating
On 07/27/2014, from 09:44 to 11:17	Reactor 1 and Reactor 2
On 05/14/2015, from 10:41 to 12:17	Reactor 1 and Reactor 2
On 05/14/2015, from 14:15 to 16:56	Reactor 1 and Reactor 2
From 05/10/2017 at 22:35 until 05/11/17 at 2:37	Reactor 1 and Reactor 2

48. From at least April 30, 2016 to the present, AOC has failed to comply with the MON by failing to submit an initial notification in violation of 40 C.F.R. § 63.2515(b).

49. From at least January 1, 2017 to the present, AOC has failed to apply for and obtain a Title V permit, in violation of 40 C.F.R. § 70.5(a)(1).

Environmental Impact of Violations

50. These violations have caused or can cause excess emissions of volatile organic compounds (VOC) including styrene which is also a HAP.

Ozone: Ground level ozone is created by chemical reactions between nitrogen oxides and VOCs in the presence of sunlight. Breathing ozone contributes to a variety of health problems including chest pain, coughing, throat irritation, and congestion. It can worsen bronchitis, emphysema, and asthma. Ground-level ozone also can reduce lung function and inflame lung tissue. Repeated exposure may permanently scar lung tissue.

Styrene: Acute (short-term) exposure to styrene in humans results in mucous membrane and eye irritation, and gastrointestinal effects. Chronic (long-term) exposure to styrene in humans results in effects on the central nervous system (CNS), such as headache, fatigue, weakness, and depression, CNS dysfunction, hearing loss, and peripheral neuropathy.

3/9/18
Date

Edward Nam
Director
Air and Radiation Division

Enclosure 1 to AOC Notice and Finding of Violation

Date	Duct Pressure oz/ in^2 (M) morning; (E) evening	Response Corrective Actions
1/1/15	(M) 23; (E) 15	None
1/2/15	(M) 22; (E) 22	None
1/4/15	(M) 18; (E) 22	None
1/5/15	(M) 24; (E) 24	None
1/6/15	(M) 23; (E) 23	None
1/7/15	(M) 25; (E) 25	None
1/8/15	(M) 24; (E) 24	None
1/9/15	(M) 25	None
1/10/15	(M) 25	None
1/11/15	(M) 21; (E) 22	None
1/12/15	(M) 23; (E) 22	None
1/13/15	(M) 24; (E) 22	None
1/14/15	(M) 24; (E) 15	None
1/15/15	(M) 22; (E) 24	None
1/16/15	(M) 22; (E) 22	None
1/17/15	(M) 19; (E) 22	None
1/18/15	(M) 22; (E) 22	None
1/19/15	(M) 22; (E) 21	None
1/20/15	(M) 21; (E) 22	None
1/21/15	(M) 22; (E) 22	None
1/22/15	(M) 20; (E) 22	None
1/23/15	(M) 20; (E) 20	None
1/24/15	(M) 19; (E) 18	None
1/25/15	(M) 20; (E) 23	None
1/26/15	(M) 18; (E) 18	None
1/27/15	(M) 22; (E) 20	None
1/28/15	(M) 24; (E) 20	None
1/29/15	(M) 22; (E) 22	None
1/30/15	(M) 24; (E) 24	None
1/31/15	(M) 24; (E) 22	None
2/1/15	(M) 22; (E) 22	None
2/2/15	(M) 23	None
2/3/15	(M) 25; (E) 25	None
2/4/15	(M) 24; (E) 22	None
2/6/15	(E) 25	None
2/7/15	(M) 24; (E) 22	None
2/8/15	(M) 25; (E) 24	None
2/10/15	(M) 25; (E) 24	None
2/11/15	(M) 22; (E) 25	None
2/14/15	(M) 21; (E) 24	None
2/16/15	(M) 24: (E) 25	None

2/17/15	(M) 24; (E) 23	None
2/18/15	(M) 23; (E) 24	None
2/19/15	(E) 24	None
2/20/15	(E) 25	None
2/21/15	(M) 25; (E) 22	None
2/22/15	(M) 23; (E) 22	None
2/24/15	(M) 24; (E) 24	None
2/25/15	(M) 24; (E) 24	None
2/26/15	(M) 25; (E) 24	None
2/27/15	(M) 25; (E) 25	None
2/28/15	(M) 25; (E) 24	None
3/1/2015	(M) 24; (E) 24	None
3/2/2015	(M) 25; (E) 25	None
3/3/2015	(M) 23; (E) 23	None
3/4/2015	(M) 24	None
3/5/2015	(M) 25	None
3/6/2015	(M) 25; (E) 24	None
3/7/2015	(M) 20	None
3/8/2015	(M) 24	None
3/9/2015	(M) 23	None
3/10/2015	(M) 21; (E) 22	None
3/11/2015	(M) 22; (E) 23	None
3/12/2015	(M) 22; (E) 22	None
3/13/2015	(M) 23; (E) 23	None
3/14/2015	(M) 20; (E) 22	None
3/15/2015	(M) 21; (E) 20	None
3/16/2015	(M) 22; (E) 22	None
3/17/2015	(M) 24; (E) 22	None
3/18/2015	(M) 22; (E) 23	None
3/19/2015	(M) 22; (E) 22	None
3/20/2015	(M) 22; (E) 22	None
3/21/2015	(M) 24; (E) 24	None
3/22/2015	(M) 22; (E) 24	None
3/24/2015	(M) 24; (E) 24	None
3/25/2015	(M) 23; (E) 22	None
3/26/2015	(M) 24; (E) 21	None
3/27/2015	(M) 22; (E) 23	None
3/28/2015	(M) 22; (E) 21	None
3/29/2015	(M) 25; (E) 20	None
3/30/2015	(M) 22; (E) 21	None
3/31/2015	(M) 20; (E) 19	None
4/1/2015	(M) 21; (E) 18	None
4/2/2015	(M) 20; (E) 20	None
4/3/2015	(M) 19; (E) 19	None
4/5/2015	(M) 22; (E) 20	None
4/6/2015	(M) 18; (E) 18	None

4/7/2015	(M) 18; (E) 25	None
4/8/2015	(M) 18; (E) 20	None
4/9/2015	(M) 18; (E) 18	None
4/10/2015	(M) 20; (E) 21	None
4/11/2015	(M) 21; (E) 20	None
4/12/2015	(M) 20; (E) 20	None
4/13/2015	(M) 20; (E) 20	None
4/14/2015	(M) 18; (E) 20.5	None
4/15/2015	(M) 17; (E) 17	None
4/16/2015	(M) 18; (E) 17	None
4/17/2015	(M) 20	None
4/19/2015	(E) 21	None
4/24/2015	(M) 20	None
4/25/2015	(M) 20	On 4/28/2015, cleaned filter due to low pressure.
5/3/2015	(E) 24	None
5/4/2015	(E) 25	None
5/5/2015	(M) 24	None
5/6/2015	(E) 20	None
5/7/2015	(M) 22; (E) 21	None
5/8/2015	(E) 17	None
5/9/2015	(M) 20; (E) 22	None
5/11/2015	(M) 25; (E) 18	None
5/12/2015	(M) 19; (E) 19	None
5/13/2015	(M) 18; (E) 18	None
5/14/2015	(M) 25; (E) 24	None
5/15/2015	(E) 21	None
5/16/2015	(M) 22; (E) 20	None
5/17/2015	(M) 18; (E) 16	None
5/18/2015	(M) 25; (E) 22	None
5/19/2015	(M) 20; (E) 12	None
5/20/2015	(M) 18; (E) 20	None
5/21/2015	(M) 20; (E) 22	None
5/22/2015	(M) 17; (E) 12	None
5/23/2015	(M 14; (E) 10	None
6/11/2015	(M) 24	None
10/2/2015	(E) 24	None
10/10/2015	(M) 3	None
12/12/2015	(M) 25	None
12/14/2015	(M) 25	None
12/21/2015	(M) 25	None
2/1/2016	(E) 16	None
2/2/2016	(E) 18	None
2/7/2016	No reading	None
2/8/2016	(E) 25	None

2/15/2016	(E) 20	None
2/19/2016	(M) 25; (E) 22	None
2/21/2016	(M) 25; (E) 24	None
2/23/2016	(E) 24	None
2/24/2016	(E) 25	None
3/9/2016	(M) 24; (E) 23	None
3/11/2016	(M) 25	None
3/16/2016	(M) 25	None
3/24/2016	(M) 24	None
3/26/2016	(M) 25	None
3/27/2016	(E) 25	None
3/30/2016	(E) 22	None
3/31/2016	(M) 25; (E) 22	None
4/1/2016	(M) 25; (E) 25	None
4/2/2016	(E) 25	None
4/4/2016	(E) 25	None
4/21/2016	(M) 25; (E) 24	None
4/22/2016	(M) 24	None
4/24/2016	(M) 25	None
4/25/2016	(M) 25; (E) 25	None
2/1/1900	(M) 25; (E) 25	None
4/27/2016	(M) 25; (E) 25	None
4/28/2016	(M) 17; (E) 24	None
4/29/2016	(M) 24; (E) 23	None
4/30/2016	(M) 24; (E) 22	None
5/1/2016	(M) 24; (E) 23	None
5/2/2016	(M) 24; (E) 18	None
5/3/2016	(M) 18; (E) 24	None
5/4/2016	(M) 20; (E) 20	None
5/5/2016	(M) 25; (E) 20	None
5/6/2016	(M) 18	None
5/7/2016	(M) 20; (E) 25	None
5/8/2016	(M) 25; (E) 25	None
5/9/2016	(M) 20; (E) 20	None
5/10/2016	(M) 20; (E) 25	None
5/23/2016	(E) 25	None
5/25/2016	(M) 25; (E) 24	None
5/26/2016	(M) 24; (E) 18	None
5/27/2016	(M) 19	TO blower filter washed 5/27/16
6/5/2016	No reading	None
11/28/2016	(E) 25	None
11/29/2016	(M) 25; (E) 25	None
12/3/2016	No reading	None
12/12/2016	(M) 25	None
12/29/2016	(M) 25	None

12/30/2016	(M) 25	None
12/31/2016	(M) 25	None
1/2/2017	(M) 25	None
1/3/2017	(M) 25; (E) 25	None
1/9/2017	(M) 25	None
1/10/2017	(M) 25	None
1/13/2017	(E) 25	None
1/14/2017	(E) 25	None
1/15/2017	(E) 25	None
1/17/2017	(E) 25	None
1/19/2017	(E) 24	None
1/20/2017	(M) 24; (E) 25	None
1/21/2017	(M) 25; (E) 22	None
1/22/2017	(M) 25	None
1/23/2017	(E) 25	None
1/27/2017	(M) 25	None
1/31/2017	(M) 24	None
2/1/2017	(M) 22	None
2/6/2017	(E) 25	None
2/7/2017	(M) 22	None
2/11/2017	(M) 25; (E) 25	None
2/12/2017	(M) 24	None
2/13/2017	(E) 21	None
2/14/2017	(M) 24; (E) 20	None
2/18/2017	(M) 20; (E) 22	None
2/19/2017	(M) 20; (E) 20	None
2/20/2017	(M) 19; (E) 20	None
2/21/2017	(M) 25	None
2/22/2017	(M) 20	TO blower filter Cleaned 2/24/17
7/4/2017	(M) 25	None

EPA United States Environmental Protection Agency

Office of Enforcement and Compliance Assurance
EPA-300-B-17-001 June 2017

U.S. EPA Small Business Resources Information Sheet

The United States Environmental Protection Agency provides an array of resources to help small businesses understand and comply with federal and state environmental laws. In addition to helping small businesses understand their environmental obligations and improve compliance, these resources will also help such businesses find cost-effective ways to comply through pollution prevention techniques and innovative technologies.

Office of Small and Disadvantaged Business Utilization (OSDBU)
www.epa.gov/aboutepa/about-office-small-and-disadvantaged-business-utilization-osdbu

EPA's OSBBU advocates and advances business, regulatory, and environmental compliance concerns of small and socio-economically disadvantaged businesses.

EPA's Asbestos Small Business Ombudsman (ASBO)
www.epa.gov/resources-small-businesses/asbestos-small-business-ombudsman or 1-800-368-5888

The EPA ASBO serves as a conduit for small businesses to access EPA and facilitates communications between the small business community and the Agency.

Small Business Environmental Assistance Program
https://nationalsbeap.org

This program provides a "one-stop shop" for small businesses and assistance providers seeking information on a wide range of environmental topics and state-specific environmental compliance assistance resources.

EPA's Compliance Assistance Homepage
www.epa.gov/compliance

This page is a gateway to industry and statute-specific environmental resources, from extensive web-based information to hotlines and compliance assistance specialists.

Compliance Assistance Centers
www.complianceassistance.net

EPA sponsored Compliance Assistance Centers provide information targeted to industries with many small businesses. They were developed in partnership with industry, universities and other federal and state agencies.

Agriculture
www.epa.gov/agriculture

Automotive Recycling
www.ecarcenter.org

Automotive Service and Repair
www.ccar-greenlink.org or 1-888-GRN-LINK

Chemical Manufacturing
www.chemalliance.org

Construction
www.cicacenter.org

Education
www.campuserc.org

Food Processing
www.fpeac.org

Healthcare
www.hercenter.org

Local Government
www.lgean.org

Surface Finishing
http://www.sterc.org

Paints and Coatings
www.paintcenter.org

Printing
www.pneac.org

Ports
www.portcompliance.org

Transportation
www.tercenter.org

U.S. Border Compliance and Import/Export Issues
www.bordercenter.org

EPA Hotlines and Clearinghouses
www.epa.gov/home/epa-hotlines

EPA sponsors many free hotlines and clearinghouses that provide convenient assistance regarding environmental requirements. Examples include:

Clean Air Technology Center (CATC) Info-line
www.epa.gov/catc or 1-919-541-0800

Superfund, TRI, EPCRA, RMP, and Oil Information Center
1-800-424-9346

EPA Imported Vehicles and Engines Public Helpline
www.epa.gov/otaq/imports or 1-734-214-4100

National Pesticide Information Center
www.npic.orst.edu or 1-800-858-7378

National Response Center Hotline to report oil and hazardous substance spills - http://nrc.uscg.mil or 1-800-424-8802

Pollution Prevention Information Clearinghouse (PPIC) - www.epa.gov/p2/pollution-prevention-resources#ppic or 1-202-566-0799

Safe Drinking Water Hotline - www.epa.gov/ground-water-and-drinking-water/safe-drinking-water-hotline or 1-800-426-4791

Toxic Substances Control Act (TSCA) Hotline
tsca-hotline@epa.gov or 1-202-554-1404

Small Entity Compliance Guides
https://www.epa.gov/reg-flex/small-entity-compliance-guides

EPA publishes a Small Entity Compliance Guide (SECG) for every rule for which the Agency has prepared a final regulatory flexibility analysis, in accordance with Section 604 of the Regulatory Flexibility Act (RFA).

Regional Small Business Liaisons
www.epa.gov/resources-small-businesses/epa-regional-office-small-business-liaisons

The U.S. Environmental Protection Agency (EPA) Regional Small Business Liaison (RSBL) is the primary regional contact and often the expert on small business assistance, advocacy, and outreach. The RSBL is the regional voice for the EPA Asbestos and Small Business Ombudsman (ASBO).

State Resource Locators
www.envcap.org/statetools

The Locators provide state-specific contacts, regulations and resources covering the major environmental laws.

State Small Business Environmental Assistance Programs (SBEAPs)
https://nationalsbeap.org/states/list

State SBEAPs help small businesses and assistance providers understand environmental requirements and sustainable business practices through workshops, trainings and site visits.

EPA's Tribal Portal
www.epa.gov/tribalportal

The Portal helps users locate tribal-related information within EPA and other federal agencies.

EPA Compliance Incentives
EPA provides incentives for environmental compliance. By participating in compliance assistance programs or voluntarily disclosing and promptly correcting violations before an enforcement action has been initiated, businesses may be eligible for penalty waivers or reductions. EPA has two such policies that may apply to small businesses:

EPA's Small Business Compliance Policy
www.epa.gov/enforcement/small-businesses-and-enforcement

EPA's Audit Policy
www.epa.gov/compliance/epas-audit-policy

Commenting on Federal Enforcement Actions and Compliance Activities

The Small Business Regulatory Enforcement Fairness Act (SBREFA) established a SBREFA Ombudsman and 10 Regional Fairness Boards to receive comments from small businesses about federal agency enforcement actions. If you believe that you fall within the Small Business Administration's definition of a small business (based on your North American Industry Classification System designation, number of employees or annual receipts, as defined at 13 C.F.R. 121.201; in most cases, this means a business with 500 or fewer employees), and wish to comment on federal enforcement and compliance activities, call the SBREFA Ombudsman's toll-free number at 1-888-REG-FAIR (1-888-734-3247).

Every small business that is the subject of an enforcement or compliance action is entitled to comment on the Agency's actions without fear of retaliation. EPA employees are prohibited from using enforcement or any other means of retaliation against any member of the regulated community in response to comments made under SBREFA.

Your Duty to Comply

If you receive compliance assistance or submit a comment to the SBREFA Ombudsman or Regional Fairness Boards, you still have the duty to comply with the law, including providing timely responses to EPA information requests, administrative or civil complaints, other enforcement actions or communications. The assistance information and comment processes do not give you any new rights or defenses in any enforcement action. These processes also do not affect EPA's obligation to protect public health or the environment under any of the environmental statutes it enforces, including the right to take emergency remedial or emergency response actions when appropriate. Those decisions will be based on the facts in each situation. The SBREFA Ombudsman and Fairness Boards do not participate in resolving EPA's enforcement actions. Also, remember that to preserve your rights, you need to comply with all rules governing the enforcement process.

EPA is disseminating this information to you without making a determination that your business or organization is a small business as defined by Section 222 of the Small Business Regulatory Enforcement Fairness Act or related provisions.

CERTIFICATE OF MAILING

I certify that I sent a Notice of Violation, No. EPA-5-18-IN-01, by Certified Mail, Return Receipt Requested, to:

Bill Sears, Plant Manager
AOC LLC
2552 Industrial Drive
Valparaiso, Indiana 45383

I also certify that I sent copies of the Notice of Violation by first-class mail to:

Phil Perry, Chief
Air Compliance Branch
Indiana Department of Environmental Management

On the 13th day of March 2018.

Kathy Jones

Kathy Jones
Program Technician
AECAB, PAS

CERTIFIED MAIL RECEIPT NUMBER: 7009 1680 0000 7641 3237